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8 *Attorneys for Subpoenaed Non-Party Western Asbestos Settlement Trust*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 RAPID-AMERICAN CORPORATION, et al.,

CASE NO.: 3:18-cv-00504-MMD-CBC

12 Plaintiffs,

13 vs.

14 TRAVELERS CASUALTY AND SURETY
15 COMPANY, et al.,

16 Defendants.

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE FOR
WESTERN ASBESTOS SETTLEMENT
TRUST TO RESPOND TO MOTION TO
TRANSFER/MOTION TO COMPEL**

(First Request)

17 Subpoenaed Non-Party Western Asbestos Settlement Trust ("Western") and Defendant
18 National Union Fire Insurance Company of Pittsburgh, PA ("National Union"), by and through
19 their respective undersigned counsel, hereby stipulate that Western shall have up to and
20 including November 19, 2018, to provide a letter or electronic mail response to National Union's
21 request that Western consent to the transfer sought in National Union's Request Pursuant to
22 Federal Rule of Civil Procedure 45(f) to Transfer Motion to Compel; Alternatively, Motion to
23 Compel Discovery from the Western Asbestos Settlement Trust ("Request to Transfer"), filed on
24 October 22, 2018 (ECF No. 1). Western's response to the Request to Transfer is presently due to
25 be filed on November 5, 2018. In the event Western does not consent to the transfer requested in
26 the Request to Transfer by November 19, 2018, Western and National Union shall thereafter
27 reach an agreed upon date by which Western must file with this Court its response to the Request
28 to Transfer.

The parties enter into this stipulation in good faith and not for the purposes of delay.
Western requires additional time to reach a decision regarding National Union's Request to

1 Transfer, which will be made at its Trustee's meeting to be held on November 15th and 16th,
2 2018. There has been no previous request for an extension of time for Western to file and serve
3 its response to the Request to Transfer.

4 DATED: November 2, 2018.

5 **FENNEMORE CRAIG, P.C.**

6 By: /s/ Leslie Bryan Hart
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Attorneys for Defendant National Union Fire
Insurance Company of Pittsburgh, Pa.

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: 11/5/2018